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**\*\*See Memorandum Endorsement  
on Following Page**

June 13, 2019

The Honorable James L. Garrity, Jr.  
United States Bankruptcy Judge  
United States Bankruptcy Court, Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

Re: ***In re Arcadia Group (USA) Limited (in Administration)***  
**Case No. 19-11650 (JLG)**

Dear Judge Garrity,

This firm represents Dan Francis Butters and Ian Colin Wormleighton, in their capacity as the duly authorized foreign representatives (in such capacity, jointly the “**Foreign Representatives**”) of Arcadia Group (USA) Limited (in Administration) as a debtor in administration under English law, pursuant to the Insolvency Act 1986, sealed and endorsed by the High Court of Justice, the Business and Property Courts of England and Wales, Insolvency and Companies List in the above-referenced case.

On June 5, 2019, 480-486 Broadway LLC and TMO I LLC (collectively, the “**Landlord Movants**”) filed the *Ex Parte Motion for an Order Pursuant to Bankruptcy Rule 2004 Authorizing the Vornado Landlords to Take Discovery of Arcadia and Daniel Francis Butters and Ian Colin Wormleighton* [ECF No. 47] (the “**Rule 2004 Motion**”). Other landlords (collectively, the “**Joining Landlords**”) have joined<sup>1</sup> in the Rule 2004 Motion, which is currently scheduled to be heard before this Court on June 14, 2019 at 2:00 p.m. (ET) (the “**Hearing**”).

The Foreign Representatives and the Landlord Movants are currently working towards a consensual resolution of the Rule 2004 Motion. To further these efforts, the Foreign Representatives request that the Hearing presently scheduled for June 14, 2019 at 2:00 p.m. (ET) be rescheduled to a hearing set during the last week of June 2019.

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<sup>1</sup> *Joinder by Brookfield Landlords to Ex Parte Motion for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Them to Take Discovery of Arcadia and Daniel Francis Butters and Ian Colin Wormleighton* [ECF No. 40]; *Joinder by the Simon Landlords to Ex Parte Motion for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Them to Take Discovery of Arcadia and Daniel Francis Butters and Ian Colin Wormleighton* [ECF No. 45] and *Joinder of Caruso to the Vornado Landlords’ Motion Authorizing Discovery of the Foreign Debtor and Its Foreign Representatives* [ECF No. 48].

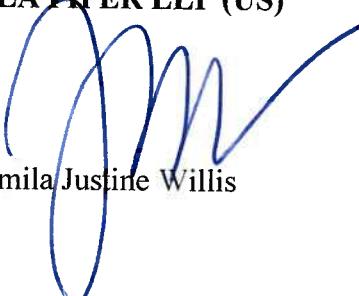


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This is the second adjournment requested by the Foreign Representatives and the first request with respect to the Rule 2004 Motion. Further, the Landlord Movants, the Joining Landlords and the Office of the United States Trustee for the Southern District of New York, have consented to the request for adjournment set forth in this letter.

Respectfully submitted,

**DLA PIPER LLP (US)**



Jamila Justine Willis

**FRIED, FRANK, HARRIS,  
SHRIVER & JACOBSON LLP**

/s/ Peter B. Siroka

Counsel to 480-486 Broadway LLC  
and TMO I LLC

**Memorandum Endorsed Order**

The above request is GRANTED.

The Rule 2004 Motion is  
adjourned to June 25, 2019 at 2:00  
p.m.

On or before June 20, 2019 at  
12:00 p.m., the parties shall file a  
joint letter with the Clerk of the  
Court (with two single-sided  
copies delivered to Chambers)  
advising whether they intend to  
go forward with the Rule 2004  
Motion on June 25.

Dated: New York, N.Y.  
June 13, 2019

/s/ James L. Garrity, Jr.  
Hon. James L. Garrity, Jr.  
United States Bankruptcy Judge